

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

MICHAEL MOATES, DC CHRONICLE,
and DC CHRONICLE LIMITED,

Plaintiffs,

v.

FACEBOOK, INC. AND AT&T INC.,

Defendants.

Case No. 4:21-cv-00694

**MOTION FOR ENTRY OF STIPULATION
REGARDING DEADLINES RELATED TO REMOVAL AND REMAND**

Plaintiffs Michael Moates, DC Chronicle and DC Chronicle Limited (“Plaintiffs”), and Defendant Facebook, Inc. (“Defendant”), by and through their undersigned counsel, request the Court to enter the stipulation agreed to by the parties and submitted as a proposed order.

Dated: September 16, 2021

Respectfully submitted,

By: /s/ Allison Jacobsen

Allison Jacobsen

Texas Bar No. 00783549

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By: /s/ Michael Moates

Michael Moates, *pro se*

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Denton, TX 76201

Pro se Plaintiff

CERTIFICATE OF CONFERENCE

I, Allison F. Jacobsen, hereby certify that I spoke today with Amber W. Booker, counsel for AT&T in this matter. AT&T agrees to the Motion and related stipulation. Ms. Booker confirmed that AT&T expects to file a Motion to Dismiss in state court in the unlikely event this case is remanded based on the lack of any timely or relevant contact with Mr. Moates. *See* Dkt. 9 (AT&T Inc.’s Verified Denial and Original Answer) (pleading that “Plaintiffs sued the wrong defendant,” that AT&T “was not involved in the action complained of in the Plaintiffs’ petition,” and that AT&T “is not a proper party”); Dkt. No. 1 (Facebook’s Notice of Removal) at ¶¶ 23–28 (arguing that AT&T was improperly joined).

Plaintiffs also previously confirmed that they agree to the Motion and related stipulation.

A handwritten signature in black ink, appearing to read 'Allison F. Jacobsen', written over a horizontal line.

Allison F. Jacobsen

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of September, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of the same to all counsel of record. I further certify that I have served AT&T and Plaintiffs via email.

By: /s/ Allison Jacobsen